

1 RICHARD A. MARSHACK, SBN 107291  
2 rmarshack@marshackhays.com  
3 DAVID A. WOOD, SBN 272406  
4 dwood@marshackhays.com  
5 LAILA MASUD, SBN 311731  
6 lmasud@marshackhays.com  
7 MARSHACK HAYS LLP  
8 870 Roosevelt, Irvine, CA 92620  
9 Tel: 949-333-7777

10 Gerald Singleton (SBN 208783)  
11 gerald@slffirm.com  
12 Terry Singleton (SBN 58316)  
13 terry@terrysingleton.com  
14 J. Ross Peabody (SBN 98190)  
15 ross@slffirm.com  
16 SINGLETON LAW FIRM, APC  
17 450 A Street, 5<sup>th</sup> Floor  
18 San Diego, CA 92101  
19 Tel. (619) 771-3473

20 Attorneys for SLF Fire Victim Claimants  
21 and certain Tubbs Preference Plaintiffs

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UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA

In re ) Bankruptcy Case  
PG&E CORPORATION and ) No. 19-30088 (DM)  
PACIFIC GAS AND ELECTRIC ) Chapter 11  
COMPANY, ) (Lead Case)  
 ) (Jointly Administered)  
Debtors. )  
□ Affects PG&E Corporation ) **JOINDER OF CERTAIN TUBBS**  
□ Affects Pacific Gas and Electric Company ) **PREFERENCE PLAINTIFFS IN**  
■ Affects both Debtors ) **SUPPORT OF RESPONSE TO**  
\*All papers shall be filed in the Lead Case, ) **OBJECTIONS TO TERMS OF**  
No. 19-30088 (DM) ) **TUBBS SETTLEMENT**  
 ) **DOCUMENTS**  
 ) **[Dkt. ## 5282, 5284, 5459, and 5497]**  
 ) Date: January 29, 2020  
 ) Time: 10:00 a.m.  
 ) Place: United States Bankruptcy Court  
 ) Courtroom 17, 16th Floor  
 ) San Francisco, CA 94102

TO THE COURT, ALL PARTIES, AND ALL ATTORNEYS OF RECORD

1       The Singleton Law Firm, APC (“SLF”), Marshack Hays, LLP, and their co-counsel represent  
2 approximately 7,000 victims of the 2015 Butte Fire, the 2017 North Bay Fires, and the 2018 Camp  
3 Fire. SLF represented the following preference plaintiffs in the Tubbs Cases -- Evelyn Venturi and  
4 Teresa Venturi-Hentz, as power of attorney for Evelyn Venturi and Trustee of and the Edward  
5 Venturi and Evelyn Venturi Family Trust, Thomas Howard, Jacqueline Tihoni, and The Tom and JT  
6 Howard 2003 Revocable Trust, Barbara Spangler, Individually and as Trustee of the Barbara A.  
7 Spangler Trust, Glenda Samson, Donald Maffioli and Catherine Maffioli (collectively, the “Tubbs  
8 Preference Plaintiffs”) -- the settlement of which is the subject of Debtors’ motion to approve the  
9 settlement (Dkt. Nos. 5282 and 5284).

10      SLF approved the terms of and executed the the Restructuring Support Agreement between  
11 the Debtor and the Tort Claimants (the “RSA”) that states in pertinent part at ¶ 2(h):

12      upon entry of the RSA Approval Order, the Debtors shall (i) have entered into one or  
13 more settlement agreements settling all of the Tubbs Cases (the “**Tubbs Settlements**”),  
14 which shall (A) allow such claims subject to payment solely from the Fire Victims  
15 Trust (as defined in the Term Sheet and provided in the Amended Plan), (B) be in form  
16 and substance satisfactory to the parties thereto, (C) **be confidential and sealed**, and  
17 (D) not be admissible or introduced into evidence for any purpose in any proceeding,  
including without limitation the Estimation Matters or in any other case or proceeding  
in or related to the Chapter 11 Cases; and (ii) have filed a motion with the Bankruptcy  
Court seeking approval of the Tubbs Settlements on shortened notice. [Emphasis  
added.]

18      In addition, along with counsel for more than 70% of the Fire Victims, as well as by a  
19 majority of the members of the TCC, SLF approved the terms of and executed the initial draft of the  
20 PG&E Fire Victims Trust Agreement. The Trust states in pertinent part at Section 2.6:

21      [T]he amount of any Fire Victim Claim that is approved, accepted, or disallowed in  
22 whole or in part shall not be disclosed to any person or entity other than to the Trustee,  
23 the Claims Administrator, Claims Processor, the Neutrals, the Fire Victim, the Fire  
Victim’s authorized agent, or to any court of competent jurisdiction, and, in the latter  
case, only then in a document filed with the court under seal.

24      In addition to a number of still-pending cases from the 2015 Butte Fire, SLF represented and  
25 settled cases on behalf of approximately 1,300 victims of the Butte Fire with the Debtor. In each of  
26 these settlements from the 2015 Butte Fire, the settlement agreement and the amount to be paid was  
27 confidential.

In order to maintain the right to privacy of our clients whose Tubbs Trial cases were settled, in keeping with prior practice that has been approved and followed by earlier courts, and in conformity with the provisions of the RSA and the PG&E Fire Victims Trust Agreement, SLF and its co-counsel hereby join in the Response to the objection filed as Document No. 5459 and respectfully requests that this Court maintain the confidentiality of the Tubbs Preference Plaintiffs' right to privacy guaranteed by the California Constitution and their right to have the amount of compensation that they receive as a result of the horrors they endured as a result of the PG&E wildfires to be kept confidential and shared only as necessary to have their claim resolved.

DATED: January 24, 2020

Respectfully submitted,

## SINGLETON LAW FIRM, APC

Gerald Singleton

By:

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Gerald Singleton, Esq.

## MARSHACK HAYS, LLP

Richard A. Marshack, Esq.

David A. Wood, Esq

Laila Masud, Esq.

## Attorneys for SLF Fire Victim Claimants and certain Tubbs Preference Plaintiffs